

## REMARKS

Although Applicant continues to disagree with the rejection of the claims, and in particular the new rejection under 35 U.S.C. §112 and the previously made §103 rejection, the claims have been amended in order to move prosecution forward. Applicant reserves the right to seek allowance of broader claims in a future continuation application.

The claim amendments here add no new matter, because they are supported in the Specification as filed, and in particular at paragraph [0030] and Fig. 6. The claim amendments are designed to more particularly recite the relationship between the plurality of zones or regions that form a control area, which is a solid block of control regions or zones. For example, referring to Fig. 6, regions 533, 540, 542, 544, and 546 are part of the periphery of the matrix 408, whereas regions 530, 531, and 532 are interior regions of the matrix. Note how the interior regions 530, 531, and 532 are surrounded by the other regions of the matrix that define its periphery.

Concerning the rejection under 35 U.S.C. §112, first paragraph (lack of enablement), Applicant respectfully disagrees with this rejection. The mapping between predefined combinations of regions or zones (from the control area) to their respective characters is not only clearly described and enabled in the application, but in fact a derivation for that relationship is also given. The derivation uses the concept of decomposing each character into "features", and finding a reduced set of common features that are found in a given set of characters. This "proof" of the mapping is not necessary for meeting the enablement requirement of 35 U.S.C. §112. It is provided only to show how the inventor arrived at a particular mapping (suggesting various mappings between control zone combinations and characters).

It is important to note that it is not necessary for the claims to recite any "features" of the characters, when claiming the invention. In fact, it is expected that in most cases, the invention may be practiced by merely mapping predefined combinations of the control zone area to the respective characters, without referencing

any particular features of the characters. In other words, it is not necessary, for example, to explicitly include, within a claim, the understanding that all of the characters “a”, “b”, “d”, “e”, “g”, “o”, “p”, and “q” can be decomposed into at least one feature, namely a closed curve. It is sufficient to claim the invention by referring to the control area, that has control zones or regions in the manner recited in Applicant’s claims as amended here. This is clearly enabled in the Specification by the numerous examples of how different characters can be represented by different control zone combinations.

A further aspect of the enablement rejection appears in the comment on page 3 of the Final Office Action, “Moreover, according to applicant’s Figs. 7, 8a and 9, the regions (the 12-zone matrix) are constructed with intervening spaces with the contrasting colors, and there is no way to form a solid block with the regions due to the separation of the regions in the 12-zone matrix (See Fig. 9 of applications specification).” In response, Applicant notes that Figs. 7, 8a and 9 are all showing how the set of features can be brought together to form a solid block. This is part of the proof or derivation mentioned above. In addition, this reference to “solid block” should be understood as referring to *essentially* a “solid block”. That is because the lines that appear between the different regions are only there to remind the reader of how the control matrix was derived, namely by decomposing characters into their features and bringing the features together to reveal control zones. See, for instance, Fig. 10b which shows the input control area being a matrix of 12 regions that form essentially a solid block, in the sense that there are no meaningful gaps between the control regions. This point has been clarified in the claims, by adding the term *essentially* where appropriate, to indicate that some small gaps can be allowed between abutting control regions. Accordingly, it is submitted that the claims are proper under 35 U.S.C. §112.

Applicant would now like to direct the Examiner’s attention to the more substantive issue of whether or not the claims are obvious in view of the prior art. None of the relied upon references teach or suggest Applicant’s claimed method for generating a desired alphanumeric character, which uses a control area made up of a

number of zones or regions that abut one another thereby essentially eliminating intervening spaces to form a solid block, where some of the zones are periphery zones that together define the periphery of the solid block, and the rest of the zones are internal zones that are within an interior region, which is enclosed by the periphery.

In U.S. Patent Application Publication No. 2004/0239624 of Ramian ("Ramian"), an electronic input apparatus is described which can be customized by users. The user can define a combination of drawn curves that resemble the desired character. An input surface 200 has a keypad 100, sensors 110, and LED 120 all superimposed and assembled together, to form the input surface. The ISF 200 has the ability to detect push button inputs at the sensors 110, for the characters 0-9, \*, and #, with the further ability to sense movement of an implement 210 across the sensors 110. However, Ramian does not teach *receiving a user's selection of a combination of one or more zones, and contrasting the combination with the remainder of a plurality of zones, so that the combination is essentially removed leaving behind a graphic symbol that resembles the desired character.* In addition, Ramian does not teach or suggest that *the plurality of zones are abutting one another to eliminate intervening spaces to essentially form a solid block.*

In U.S. Patent No. 4,727,357 issued to Curtin ("Curtin"), a compact keyboard for entering alphanumeric characters is described in which there are bars that are capable of being activated for providing light. Each bar is switchable between an activated lit condition, and an off condition. All of the bars are normally activated and, hence, emit light. During use, when forming characters, the necessary bars are deactivated, so that the remaining lit bars form the desired alphanumeric character. The character formation key 40 is made up of 16 bars (6-36) that form an outer box pattern, while inner horizontal bars 22 and 24 appear to bisect the key area. As seen in Fig. 1 and Fig. 6 of Curtin, the character key has significant intervening spaces between the bars. Curtin does not teach or suggest that *the plurality of zones are abutting one another to eliminate intervening spaces to essentially form a solid block.* Accordingly, Ramian and Curtin do not teach or suggest all of the limitations of Applicant's claim 1. For the above reasons, Applicant submits that claim 1 is not obvious in view of the relied upon art references.

As to claim 21, this claim has also been amended to reflect the concept of a *control area that is essentially a solid block*. As explained above, neither Ramian nor Curtin teaches or suggests Applicant's claimed *control area that essentially forms a solid block*. In addition, the combination of Ramian and Curtin would not reasonably teach or suggest to one of ordinary skill that *each character that has a closed curve as its feature be associated with a respective control region selection that includes at least one interior region of such a control area*. Accordingly, claim 21 is also not obvious in view of the relied upon art references.

Claim 29 has been amended in a manner similar to claim 21 and is therefore submitted as not being obvious for at least the same reasons.

This amendment has also canceled several claims, in order to streamline the issues and advance prosecution.

Any dependent claims not mentioned above are submitted as not being anticipated or obvious, for at least the same reasons given above in support of their base claims.

It should be noted that not all of the assertions made in the Final Office Action, particularly those with respect to the dependent claims, have been addressed here, in the interest of conciseness. Applicant reserves the right to challenge any of the assertions made in the Final Office Action by the Examiner, with respect to the relied upon art references and how they would relate to Applicant's claim language.

### **CONCLUSION**

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date.

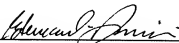
If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No.

02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR, & ZAFMAN LLP

Dated: January 8, 2007.

By   
Farzad E. Amini, Reg. No. 42,261

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, California 90025  
(310) 207-3800

**CERTIFICATE OF ELECTRONIC FILING**

I hereby certify that this paper is being transmitted online via EFS Web to the Patent and Trademark Office, Commissioner for Patents, Post Office Box 1450, Alexandria, Virginia 22313-1450, on January 8, 2007.

  
Margaux Rodriguez January 8, 2007